

# EXHIBIT C

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**From:** Mufson, Harris M.  
**Sent:** Sunday, November 24, 2024 9:52 PM  
**To:** Juan Pablo Alban  
**Subject:** Notice

Juan Pablo,

Given the clear breakdown in the attorney-client relationship between Gibson Dunn and Swan, I write to advise you that Gibson Dunn will be filing a motion to withdraw from representing Swan in the federal court action. In accordance with C.D. L.R. 83-2.3.4, Swan should be aware that it cannot appear *pro se* because it is an organization and organizations cannot appear *pro se* in federal court. The consequence of the inability of Swan to appear *pro se* is that, if the Court grants our motion to withdraw, Swan will not be able to litigate the action further until it obtains new counsel. If Swan does not obtain new counsel, the action could be dismissed for lack of prosecution.

We remain ready to execute a substitution of counsel for whatever replacement counsel Swan desires, which would avoid unnecessary motions practice and avoid a situation where Swan could be unrepresented.

Sincerely,

Harris

**Harris M. Mufson**  
[Partner](#)

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